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PARAMOUNT EQUITY MORTGAGE, LLC  
dba LOANPAL

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DONALD SULLIVAN,  
Plaintiff,  
v.  
PARAMOUNT EQUITY  
MORTGAGE, LLC dba LOANPAL,  
Defendant.

Case No. 2:19-cv-00567-APG-BNW

**STIPULATION FOR EXTENSION  
OF TIME TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

**(FIRST REQUEST)**

Defendant Paramount Equity Mortgage, LLC dba Loanpal (hereinafter "Loanpal"), by and through its counsel, Timothy J. Lepore of Ropers Majeski Kohn & Bentley, and Plaintiff Donald Sullivan ("Plaintiff"), by and through his counsel, Michael Kind of Kazerouni Law Group, APC, hereby stipulate and agree as follows:

1. On April 4, 2019, Plaintiff filed his Complaint in the United District Court, Central District of Nevada, naming Loanpal as a defendant.

2. On April 5, 2019, this Court issued Summons for Loanpal, directing Loanpal to respond to the Compliant within 21 days after service of the Complaint and Summons.

3. On April 17, 2019, Plaintiff caused for a process server to serve the Complaint and Summons on Loanpal's registered agent. As a result, according to

Rule 12 of the Federal Rules of Civil Procedure, Loanpal's last day to respond to Plaintiff's Complaint is May 8, 2019.

4. The parties subsequently entered into settlement negotiations in an attempt to bring this matter to resolution before engaging in protracted litigation.

5. Accordingly, Plaintiff and Loanpal have stipulated that Loanpal's last day to file a responsive pleading or motion to Plaintiff's Complaint is June 19, 2019.

**IT IS SO STIPULATED.**

Dated: May 21, 2019

ROPER, MAJESKI, KOHN & BENTLEY

By: /s/ Timothy J. Lepore  
TIMOTHY J. LEPORE  
Attorneys for Defendant  
PARAMOUNT EQUITY  
MORTGAGE, LLC  
dba LOANPAL

Dated: May 21, 2019

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind  
MICHAEL KIND  
Attorneys for Plaintiff  
DONALD SULLIVAN

**IT IS SO ORDERED:** Defendant Loanpal's last day to file a responsive pleading or motion to Plaintiff's Complaint is June 19, 2019.

  
UNITED STATES MAGISTRATE JUDGE

Dated: May 22, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on this 21<sup>st</sup> day of May, 2019, I served a true and correct copy of the foregoing **STIPULATION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT (FIRST REQUEST)** via the Court's CM/ECF electronic filing and service system to all parties on the current service list.

/s/ Peggy Kurilla  
Peggy Kurilla, an employee of  
ROVERS, MAJESKI, KOHN &  
BENTLEY